



U.S. Department of Justice

Civil Division

Washington, DC 20530

VIA ECF

Honorable Hugh Scott
United States Magistrate Judge
United States District Court
2 Niagara Square
Buffalo, NY 14202

Re: *Privacy International, et al. v. Federal Bureau of Investigation, et al.*
No. 18-cv-1488 (W.D.N.Y.)

Dear Judge Scott:

Assistant United States Attorney Michael Cerrone and I represent the defendants in this Freedom of Information Act case. On May 17, 2019, the Court granted a consent motion to extend the time file the parties' joint proposed discovery plan and schedule to June 17, 2019. Defendants, with the consent of plaintiffs, hereby respectfully request the Court to grant a further 45 day extension of time to file the joint plan until August 1, 2019.

This matter concerns FOIA requests that plaintiffs have made to 11 federal agencies. The parties continue to be engaged in discussions regarding the scope of those requests and the accompanying search, but have not yet reached an agreement. Accordingly, because the parties are still negotiating the scope of the requests, they are not yet in a position to advise the court of a proposed case management order. For these reasons, defendants, with the consent of plaintiffs, respectfully request a 45-day extension to submit the joint plan and schedule.

Sincerely,

Marcia K. Sowles
Senior Trial Counsel